

OCC Fair Lending Conference

Statistical Analysis and Modeling for Risk Assessment

September 9-10, 2008 • The Astor Crowne Plaza • New Orleans • French Quarter



John C. Dugan

Comptroller of the Currency



John C. Dugan was sworn in as the 29th Comptroller of the Currency in August 2005.

The Comptroller of the Currency is the administrator of national banks and chief officer of the Office of the Comptroller of the Currency (OCC). The OCC supervises about 1,700 federally chartered commercial banks and about 50 federal branches and agencies of foreign banks in the United States, comprising nearly two-thirds of the assets of the commercial banking system. The Comptroller also serves as a director of the Federal Deposit Insurance Corporation, the Federal Financial Institutions Examination Council, and NeighborWorks® America.

In September 2007, Comptroller Dugan was also named chairman of the Joint Forum, which operates under the aegis of the Basel Committee on Banking Supervision, the International Organization of Securities Commissions, and the

International Association of Insurance Supervisors. The Joint Forum includes senior financial sector regulators from the United States, Canada, Europe, Japan, and Australia, and deals with issues common to the banking, securities, and insurance industries, including supervision of conglomerates.

Before his appointment as Comptroller, Mr. Dugan was a partner at the law firm of Covington & Burling, where he chaired the firm's Financial Institutions Group and specialized in banking and financial institution regulation.

He served at the Department of the Treasury from 1989 to 1993 and was appointed Assistant Secretary for Domestic Finance in 1992. While at Treasury, Mr. Dugan had extensive responsibility for policy initiatives involving banks and financial institutions, including the savings and loan cleanup, Glass-Steagall and banking reform, and regulation of government-sponsored enterprises. In 1991, he oversaw a comprehensive study of the banking industry that formed the basis for the financial modernization legislation proposed by the administration of the first President Bush.

From 1985 to 1989, Mr. Dugan was Counsel and Minority General Counsel for the U.S. Senate Committee on Banking, Housing, and Urban Affairs. There he advised the committee as it considered the Competitive Equality Banking Act of 1987, the Proxmire Financial Modernization Act of 1988, and the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

Among his professional and volunteer activities before becoming Comptroller, he served as a director of Minbanc, a charitable organization whose mission is to enhance professional and educational opportunities for minorities in the banking industry. He was also a member of the American Bar Association's committee on banking law, the Federal Bar Association's section of financial institutions and the economy, and the District of Columbia Bar Association's section of corporations, finance, and securities laws.

A 1977 University of Michigan graduate with an A.B. in English literature, Mr. Dugan also earned his J.D. from Harvard Law School in 1981. Born in Washington, D.C. in 1955, Mr. Dugan lives in Chevy Chase, Maryland, with his wife, Beth, and his two children, Claire and Jack.



Robert Aaronson

Senior Vice President

JPMorgan Chase

Robert Aaronson is JPMorgan Chase's Corporate Fair Lending Officer and Fair Lending Executive for Home Lending Legal & Compliance, Fair Lending Risk Management, and Home Mortgage Disclosure Act Reporting.

Mr. Aaronson recently celebrated his 23rd anniversary as an employee. He was originally hired as a consultant to Chemical Bank in 1982 to combat the industry's first wave of counterfeit credit card fraud. He created the first Credit Risk Management Department for revolving credit products and became head of Credit Policy and Risk Management for credit cards and overdraft checking in 1988. In 1989, Mr. Aaronson was recruited to apply the same analytical and statistical approaches as the Credit Risk Manager for the new national mortgage business. In 1993, his role expanded to include all consumer credit products, except credit cards, in the Consumer Asset Portfolio Quality Unit (CAPQU). After the Chemical-Chase merger in 1996, CAPQU was dissolved, and he re-joined the mortgage company as the Information Technology project manager implementing the automated underwriting system. Afterwards, Mr. Aaronson moved into strategic product development with some additional responsibility for fair lending issues. That additional responsibility has grown into a department with a staff of 15 that manages fair lending risk for Chase Home Lending and supervises fair lending risk for credit cards, auto and education finance, small business lending, etc.

Prior to his consumer banking career, Mr. Aaronson did research in cell biology and taught microbiology and infectious diseases at the City University of New York Medical School. He has been married for almost 30 years and has two semi-grown sons who have provided him with untold opportunities to tear his much-pulled hair out. Mr. Aaronson will drop anything for a game of three-on-three.

Robert B. Avery

Senior Economist

Division of Research and Statistics

Federal Reserve Board

Robert B. Avery is a Senior Economist in the Division of Research and Statistics at the Board of Governors of the Federal Reserve System. Prior to rejoining the Board of Governors in 1994, he was a professor at Cornell University. His work at the Federal Reserve focuses on supervisory issues related to community affairs and bank supervision. He is a coauthor of a number of recent studies in these areas including the Federal Reserve's Congressional Report on Disparate Impact in Credit Scoring, and Federal Reserve Bulletin articles on the 2004, 2005 and 2006 Home Mortgage Disclosure Act (HMDA) data and revisions to the Community Reinvestment Act (CRA) in 2005. He also designed the Federal Reserve's fair lending HMDA screening program and its loan sampling system for small bank safety and soundness examinations.

Mr. Avery has a B.A. from the University of Pennsylvania and a Ph.D. from the University of Wisconsin.

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Lawrence L. Boudreaux III

Senior Vice President

Omni Bank

Lawrence L. Boudreaux III is Senior Vice President for Public Relations and Business Development at Omni Bank. Mr. Boudreaux joined the bank in 2003 with responsibility first for Retail Operations and Development and then Facilities Management. He began his banking career in 1969 at Hibernia National Bank of New Orleans where he was in the data processing area and later became Business Development Officer. In 1976 he joined Pelican Homestead and Savings Association. In 1986, he was promoted to Senior Executive Vice President and in 1988 was elected President to the Board of Directors. He was elected in 1988 President of Pelican Capital Corporation, a newly formed subsidiary of Pelican Homestead. There he was involved in merger negotiations and evaluations. He lobbied the U.S. Congress during the mark up of the Financial Institutions Reform, Recovery and Enforcement Act (FIRREA). He became President of Fidelity Homestead in 1992 and served in that position and as Chief Executive Officer and Board Member until 2003.

Mr. Boudreaux has been a member of numerous national and local organizations such as the Federal Home Loan Bank Board of Directors, the Council of Federal Home Loan Banks, the Federal Reserve Bank's Thrift Industry Advisory Committee, Neighborhood Housing Services (President of the Board), the American Red Cross Board of Directors, and the New Orleans Council of Business Economists (Vice President).

Mr. Boudreaux received an M.B.A. from Tulane University through the Executive MBA Program in 1988.



Michael S. Bylsma

Director

Community and Consumer Law Division

Office of the Comptroller of the Currency

Michael S. Bylsma is Director of the Community and Consumer Law Division in the OCC's Law Department. The Division of Community and Consumer Law provides guidance to national banks and OCC examiners on consumer compliance laws, such as the Truth in Lending, Electronic Fund Transfer, Federal Trade Commission (FTC) Act, and Fair Credit Reporting Acts, and on community development and fair lending laws, such as the Equal Credit Opportunity, Home Mortgage Disclosure, and Community Reinvestment Acts.

Prior to joining the OCC in 1994, Mr. Bylsma was a Senior Attorney with the Board of Governors of the Federal Reserve System, where he worked for 10 years on consumer law issues, including the development of the 1994 Interagency Policy Statement on Fair Lending. At the OCC, he has been actively involved in the agency's efforts to prevent unfair, deceptive, and abusive lending acts or practices through enforcement of the FTC Act. He helped develop the OCC's supervisory guidance on unfair and deceptive practices under the FTC Act, on preventing abusive mortgage lending practices, and on safety and soundness and consumer protection issues affecting subprime mortgage loans. Mr. Bylsma is also the lead participant in developing amendments to the Community Reinvestment Act (CRA) regulations to provide CRA incentives for community development loans, services, and investments in neighborhoods affected by high levels of foreclosures.

He is coauthor, with OCC Chief Counsel Julie L. Williams, of several articles on bank compliance matters published in the *Business Lawyer*. These articles include: *On the Same Page: Federal Banking Agency Enforcement of the FTC Act to Address Unfair and Deceptive Practices by Banks*, 58 *Business Lawyer* 1243 (May 2003), *Federal Preemption and Federal Banking Agency Responses to Predatory Lending*, 59 *Business Lawyer* 1193 (May 2004); *Developments in Credit Card Practices and Related Actions by the OCC to Protect Consumers*, 60 *Business Lawyer* 691 (May 2005); and *A Renewed Federal Focus on Credit Card Disclosures*, 61 *Business Lawyer* (May 2006).

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Souphala Chomsisengphet

Senior Financial Economist

Office of the Comptroller of the Currency

Souphala Chomsisengphet is a Senior Financial Economist in the Credit Risk Modeling Unit of the Risk Analysis Division at the OCC. Her current work at the OCC involves evaluating the development and validation of credit risk models used by financial institutions for underwriting, risk management, and capital allocation. She has research interests in issues related to household finance and financial institutions. Her research has been published in the *Journal of Urban Economics*, *Journal of Financial Intermediation*, *Real Estate Economics*, and *Journal of Housing Economics*. Prior to joining the OCC in 2004, Ms. Chomsisengphet was an Economist at the Office of Federal Housing Enterprise Oversight.

Ms. Chomsisengphet earned a Ph.D. in economics from the University of Wisconsin–Milwaukee.

Karyen Chu

Senior Financial Economist

Federal Deposit and Insurance Corporation

Karyen Chu is a Senior Financial Economist in the Consumer Finance Research section of the FDIC's Division of Insurance and Research. She provides statistical modeling support on fair lending issues to the FDIC's Division of Supervision and Consumer Protection and performs research on consumer finance topics including HMDA and mortgage-related issues.

Previously, Dr. Chu was a health policy researcher at Mathematica Policy Research, where she worked on studies of Medicaid managed care and health care market changes. Dr. Chu received her PhD in Economics from the University of California, Berkeley. She also holds a Masters in Public Policy from the University of California, Berkeley and a Bachelors of Arts from Occidental College.



Sharon MW Decker

National Bank Examiner

Large Bank Supervision

Office of the Comptroller of the Currency

Sharon MW Decker is a National Bank Examiner, currently assigned to the Large Bank East Team in New York City. She is specifically assigned to the core staff at Citibank as the team leader for compliance risk.

Ms. Decker is a compliance specialist who has examined all aspects of banks' compliance programs, including the Bank Secrecy Act, anti-money laundering, consumer protection laws, and the Community Reinvestment Act. She is an instructor at the OCC-sponsored Advanced Anti-Money Laundering School. She has also previously instructed the OCC Fair Lending School.

Prior to joining the Large Bank Team, Ms. Decker was the Assistant Deputy Comptroller for Compliance in the Northeast. Before moving to New York from Chicago, she worked in banks of all sizes, reviewing safety and soundness. She was one of the original Information Technology examiners at the OCC.

Ms. Decker received her B.S. in finance from the University of Illinois.

Jason Dietrich

Fair Lending Lead Expert

Office of the Comptroller of the Currency

Jason Dietrich is the Fair Lending Lead Expert in the Financial Access and Compliance Unit of the Risk Analysis Division at the OCC. He has been at the OCC since July 1999. He received his Ph.D. in economics from the University of North Carolina at Chapel Hill. He builds statistical models to assess fair lending risk during bank examinations and provides other types of statistical support to the OCC's bank supervision efforts. He also conducts independent scholarly research on the topics of discrimination and quantitative methods.

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Chau Do

Senior Economist

Office of the Comptroller of the Currency

Chau Do is a Senior Economist in the Financial Access and Compliance (FAC) Unit of the Risk Analysis Division at the OCC.

Ms. Do has worked at FAC since 2004. She has participated in several fair lending examinations of large banks. Her role is to provide technical support to examiners by using statistical tools to assess fair lending compliance. In addition, she assists the Compliance Policy Division in identifying banks that exhibit the highest potential for fair lending risk and in developing annual Home Mortgage Disclosure Act reports that document the trends within the national banking system. She also conducts and publishes research in applied microeconomics, specifically in areas related to housing, fair lending, family, and education.

Ms. Do holds a Ph.D. in economics from the University of California, Santa Barbara, and a B.A. in economics from Santa Clara University.

Carol Evans

Special Counsel and Manager, Fair Lending

Federal Reserve Board

Carol Evans is the Special Counsel and Manager of the Fair Lending Enforcement Section in the Division of Consumer and Community Affairs at the Federal Reserve Board. Ms. Evans is responsible for developing and implementing fair lending enforcement policy. Additionally, her team works closely with Federal Reserve examiners, providing additional legal and statistical expertise to ensure that fair lending laws are enforced rigorously throughout the Federal Reserve System. Ms. Evans also serves as the Chairwoman of the Joint Agency Task Force on Discrimination in Lending.

Previously, Ms. Evans was an Associate General Counsel in the Legal Department at Fannie Mae, where she provided fair lending and anti-predatory lending advice. She has also worked for the U.S. Department of Justice in both the Civil Rights and Civil Divisions. In the Civil Rights Division, Ms. Evans was a Senior Trial Attorney with a focus on fair lending enforcement. In the Civil Division, she served as a Trial Attorney and defended federal agencies in litigation challenging the legality of government policies and actions.

Ms. Evans graduated magna cum laude from Smith College and Harvard Law School. After law school, she clerked for Judge Cornelia G. Kennedy, U.S. Court of Appeals for the Sixth Circuit. Prior to attending law school, she did economic research and statistical modeling.



Irene Fang

Deputy Director for Financial Access and Compliance
Risk Analysis Division
Office of the Comptroller of the Currency

Irene Fang has been head of the Financial Access and Compliance (FAC) Unit, in the Risk Analysis Division at the OCC, since its creation in 1998. As such, she has built a quantitative modeling and research group that is an integral part of the OCC's risk-based compliance supervision program. Unit economists and research analysts provide expert statistical modeling and analysis to support the agency's regulatory and supervisory responsibilities in the fair lending and consumer protection areas. FAC staff join OCC fair lending examination teams, building statistical models that test an institution's underwriting or pricing decisions, as well as other lending practices, for potentially disparate treatment. Unit economists also contribute technical expertise to examination teams that evaluate bank credit scoring systems for compliance with Regulation B and the Equal Credit Opportunity Act. The unit actively pursues innovative research that advances and enhances the examination support FAC provides, publishing papers in the OCC Working Paper series and in journals.

Dr. Fang is responsible for providing expert analysis and policy advice to agency officials on various compliance and consumer protection topics. She regularly advises examiners and banks on compliance risk assessment and risk management.

Previous to her current position, Dr. Fang was head of a group providing written testimony and briefing materials for the Comptroller's congressional appearances. Topics included financial modernization and deposit insurance reform.

Dr. Fang joined the OCC 20 years ago as a Financial Economist. She holds a B.A. in economics from Yale and a Ph.D. in economics from the University of Michigan.

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John D. Gilliam

National Bank Examiner

Large Bank Supervision

Office of the Comptroller of the Currency

John Gilliam is a National Bank Examiner with the OCC assigned to Large Bank Supervision. He is responsible for evaluating compliance risk in one of the largest national banks west of the Appalachian Mountains and assessing compliance management, fair lending, Community Reinvestment Act, and Bank Secrecy Act/Anti-money Laundering Act activities. Mr. Gilliam joined the OCC in 1976 and was based in the Belleville, Illinois Duty Station. In 2006, he celebrated his 30th anniversary with the OCC.

Mr. Gilliam performed his first consumer compliance examination in 1978 and was commissioned a National Bank Examiner in 1981. In 1985 he moved to the Western District as the District Compliance Liaison. There he coordinated the District's consumer complaint process, taught its consumer school, and acted as its liaison for consumer affairs with the banking community, field examiners, and the public. He joined Large Bank Supervision in 1993 and was assigned compliance supervision of two large national banks. In 2004 he was selected Compliance Team Leader.

Mr. Gilliam received a B.S. degree from the University of Missouri in 1974.

Carol E. Goodwin

Senior Vice President

Bank of America

Carol Goodwin is a Senior Vice President with Bank of America. She manages the Fair Lending Team and the Home Mortgage Disclosure Act/Community Reinvestment Act Data Assessment Team as part of the Compliance and Operational Risk organization. Ms. Goodwin is a Certified Regulatory Compliance Manager and has served in compliance and internal audit roles with Bank of America and predecessor institutions for over 20 years. Prior to joining the private sector she was an examiner with the OCC. She is the past president of the Bank Compliance Association of Connecticut and a member of the Consumer Bankers Association Fair Lending Committee.



Lynn Gottschalk

Economist

Federal Reserve Board

Lynn Gottschalk is an Economist in the Fair Lending Enforcement Section in the Division of Consumer and Community Affairs at the Federal Reserve Board. Ms. Gottschalk is responsible for conducting and supervising pricing and underwriting reviews of banks throughout the Federal Reserve System.

Previously, Ms. Gottschalk was an Economist at the Federal Trade Commission (FTC) in the Consumer Protection Division. While at the FTC, she worked on fair lending issues as well as in other consumer protection areas.

Ms. Gottschalk received her M.A. and Ph.D. in economics from the University of Illinois, Urbana-Champaign. She graduated summa cum laude from the University of Northern Iowa.

Calvin R. Hagins

Director for Compliance Policy

Office of the Comptroller of the Currency

Calvin Hagins became Director for Compliance Policy at the OCC in October 2005. In that position, he serves as OCC's senior manager and plans, organizes, implements, and directs activities associated with identifying risks. He also provides guidance on policy issues affecting the compliance process and consumer policy programs and issues. He reports to and serves as an expert advisor to the Deputy Comptroller for Compliance Policy and the Senior Deputy Comptroller and Chief National Bank Examiner on all community and consumer policy matters. He interprets policies and procedures and represents the OCC externally and internally on community and consumer policy issues.

From March 2003 through September 2005, he served as Senior Advisor to the Deputy Comptroller for Compliance Policy. In that position, he served as an expert on the formulation and implementation of a broad range of policies and procedures relating to the efficient and effective supervision of compliance risk. He also advised OCC executive management and examiners throughout the country on complex compliance supervision issues and provided recommendations on a broad range of compliance supervision, operational, and planning matters.

From March 1999 through March 2003, he served as the Assistant Deputy Comptroller (ADC) – Compliance. He provided technical expertise and guidance to the Southeast District's midsize and community banks on all aspects of consumer compliance, Community Reinvestment Act (CRA), fair lending, and Bank Secrecy Act/Anti-money Laundering activities.

Prior to serving as the ADC – Compliance, he served as an examiner in the Compliance Cadre from 1994 to 1999. During that period, Mr. Hagins was an instructor in the National Basic Consumer Compliance School, the National Fair Lending School, and the National CRA School.

Mr. Hagins joined the OCC in 1987 and was commissioned a National Bank Examiner in 1993. He holds a B.S. in finance from the University of South Florida in Tampa.

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Marilyn Jacob

Financial Economist

Office of the Comptroller of the Currency

Marilyn Jacob is a Financial Economist in the Financial Access and Compliance Unit of the Risk Analysis Division at the OCC. She has been with the OCC since September 2006. She builds statistical models to assess fair lending risk during bank examinations and provides other types of statistical support to the OCC's bank supervision efforts. She also conducts independent scholarly research on the topics of discrimination in housing and labor markets.

She received her Ph.D. in economics from University of Maryland, College Park.

Ann F. Jaedicke

Deputy Comptroller for Compliance Policy

Office of the Comptroller of the Currency

Ann F. Jaedicke has served as Deputy Comptroller for Compliance Policy at the OCC since December 2003. She is responsible for policy and examination procedures relating to consumer issues and anti-money laundering. She is a member of the Federal Financial Institution Examination Council (FFIEC) Consumer Compliance Task Force and the FFIEC's Bank Secrecy Act Task Force. These task forces of U.S. regulators promote policy coordination and the uniform enforcement of laws and regulations. Ms. Jaedicke also sits on OCC's Enforcement Committee and its National Risk Committee.

Ms. Jaedicke began her career in 1977 as a bank examiner in Texas. From 1984-1986, she worked in OCC's London office where she examined branches of U.S. banks. Later she served as the Director for OCC's Large Bank Division. In 1997, she was promoted to Deputy Comptroller for Supervision Operations where she managed, among other things, OCC's problem bank division. In 2001 and 2002, Ms. Jaedicke led projects to restructure OCC's six districts and OCC's Washington, D.C. headquarters.

Ms. Jaedicke is a native Texan and a graduate of Texas A&M University.



Nicholas M. Kiefer

Ta-Chung Liu Professor of Economics

Cornell University and Office of the Comptroller of the Currency

Nicholas M. Kiefer is the Ta-Chung Liu Professor of Economics at Cornell University, where he is a member of the graduate field faculties in economics and statistics, and is a Senior Advisor to the Risk Analysis Division at the OCC. He is widely known for his theoretical and applied contributions in the econometric modeling of duration data, the estimation of dynamic programming models under learning, and modeling financial market microstructure. Mr. Kiefer's current research includes applications in financial economics, credit scoring, and risk management, with special emphasis on default estimation and operational risk modeling when data are limited. He proposes formal probabilistic incorporation of expert information to supplement data information.

Mr. Kiefer is an internationally recognized expert, having published more than 100 journal articles, books, and reviews. He is a Fellow of the Econometric Society, and a past recipient of the Guggenheim Memorial Fellowship.

YuehChuan Kung

Risk Management Manager

Wells Fargo & Company

YuehChuan Kung is an Applied Statistician and Economist with more than 10 years of experience in risk modeling, scorecard development, loss forecasting and profitability analysis, and statistical sampling. She is currently employed at Wells Fargo & Company within the Law Department – Consumer Real Estate Division as a Risk Management Manager. In this role, she manages an analytics team developing and maintaining statistical models and analysis for fair lending in pricing, underwriting, and loss mitigation solutions for Wells Fargo & Company.

Mark Levonian

Senior Deputy Comptroller for Economics

Office of the Comptroller of the Currency

Mark Levonian is Senior Deputy Comptroller for Economics at the OCC in Washington D.C. In this position, he is responsible for the various economics functions of the OCC, including the provision of quantitative support for examinations at national banks in the United States. Mr. Levonian has previously been head of the Banking Studies Department at the Federal Reserve Bank of New York and Vice President in Banking Supervision and Regulation at the Federal Reserve Bank of San Francisco. He has been a lecturer in finance at the University of California's Haas School of Business in Berkeley and has been an advisor or consultant to the International Monetary Fund, the World Bank, and various foreign central banks.

Mr. Levonian has a Ph.D. in economics from M.I.T., and a B.A. in economics from the University of California.

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Donald Morrow

Statistician and Senior Consultant

Wolters Kluwer Financial Services/PCi

Before joining Wolters Kluwer Financial Services/PCi, Donald Morrow was the Economic Research Manager for the Fair Lending Analytical Research Department at Wachovia Bank in Charlotte, North Carolina. There he was responsible for all aspects of statistical testing and research related to fair lending for the company's mortgage, auto finance, and credit card businesses. Before joining Wachovia in April 2003, he worked for three years developing credit scoring, loss forecasting, and risk-based pricing models for CitiFinancial International. Previous to his stint with Citigroup he worked as a macro/development economist for three years in Kuwait with both the United Nations and the National Bank of Kuwait.

Mr. Morrow has a Ph.D. in economics from the University of Colorado-Boulder and an M.A. and B.A. from the University of New Mexico.

Donna M. Murphy

Deputy Chief

Civil Rights Division

United States Department of Justice

Donna Murphy is a Deputy Chief in the Civil Rights Division of the United States Department of Justice. She works in the Housing and Civil Enforcement Section, managing the docket of cases and investigations under the statutes that prohibit patterns or practices of lending discrimination. Ms. Murphy also reviews cases and matters involving discrimination in housing and public accommodations and handles a wide range of administrative matters. In 2007, she received the John Doar award for outstanding contributions to the Civil Rights Division.

Prior to joining the Housing Section, Ms. Murphy served as Deputy Chief in the Special Litigation Section, managing the docket of complex and sensitive matters under the statutes that prohibit patterns or practices of police misconduct. Before that she served as a Deputy Chief and Trial Attorney in the Division's Voting Section. In the Voting Section, she handled and supervised a wide range of complex cases concerning compliance with the Voting Rights Act and the Fourteenth and Fifteenth Amendments and received the Civil Rights Division's Walter W. Barnett Memorial Award for extraordinary skill in advocacy.

Prior to joining the Civil Rights Division, Ms. Murphy served as a law clerk for the Honorable Myron H. Thompson, U.S. District Judge in Montgomery, Alabama. She received her law degree from Yale Law School and is a summa cum laude graduate of American University in Washington, D.C.



Irina Paley

Senior Economist

Office of the Comptroller of the Currency

Irina Paley is a Senior Economist in the Financial Access and Compliance (FAC) Unit of the Risk Analysis Division at the OCC.

Ms. Paley has worked in FAC since 2005. She has participated in numerous fair lending examinations of large and medium-sized banks. Her role is to provide statistical and analytical support to examiners in the area of compliance with fair lending regulations. She analyzes banks' Home Mortgage Disclosure Act and proprietary data, provides recommendations regarding focal points for the examinations, builds models to assess fair lending risk after accounting for the borrowers' credit worthiness, and provides matched files for review. She also conducts and publishes research in labor economics, the economics of housing, and mortgage markets.

Ms. Paley holds a Ph.D. in economics from Brown University, and a B.A. in economics from Brandeis University.

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Arthur R. (Rick) Preiss

President and Founder

Preiss&Associates, LLC

Rick Preiss is President and Founder of Preiss&Associates, LLC, a full-service compliance consulting firm. Since 1992, Preiss&Associates has been using regulator procedures to perform custom monitoring analyses for financial institutions. Initially, Preiss&Associates developed Logit Monitoring for Home Mortgage Disclosure Act race-based underwriting decisions; however, the company's statistical practice quickly diversified into other credit products (e.g., home equities, indirect auto, as well as other types of consumer loans). As the regulatory use of statistics has expanded, Preiss&Associates has introduced additional products such as Credit Price Monitoring that analyzes credit prices (e.g., note rates, annual percentage rates, discretionary fees, and overages) as well as credit-score overrides and the potential for steering. In addition to its custom consulting practice, Preiss&Associates uses its statistical expertise to assist clients who have statistical software in the development of their regression equations for inclusion in their software. Finally, law firms defending financial institutions in fair lending litigation have engaged Preiss&Associates to perform statistical work. The firm's consulting practice is national in scope and includes clients from all the regulatory agencies.

As a result of his experience in both the academic and business communities, Mr. Preiss brings his clients a unique balance between these two environments. This orientation is particularly helpful in his consulting practice as he applies sophisticated statistical techniques to everyday business circumstances. Mr. Preiss' business experience provides him with a management perspective and cost discipline that benefit his clients. Besides his technical skills, he has knowledge of the on-going discrimination research being done in various government agencies and academia. Mr. Preiss is a contributor to national publications such as the *ABA Bank Compliance*, *American Banker*, and the *Sloan Management Review*. Additionally, his articles have appeared in numerous regional banking publications.

Before founding Preiss&Associates, Mr. Preiss' career reflects 20 years in positions of increasing management responsibility at companies such as Cummins Engine Company in Columbus, Indiana, Wharton Econometrics Forecasting Associates in Philadelphia and with leading Chicago area firms such as Abbott Laboratories, IC Industries and Baxter International. Positions held include Corporate Economist, Vice President of Strategic Planning, and Vice President of Sales and Marketing.

Mr. Preiss earned an undergraduate degree from Emory University and an M.B.A and a Ph.D. in economics from Indiana University. During his doctoral course work, he specialized in econometrics and, while completing his dissertation, worked for the Nobel Laureate Lawrence Klein at Wharton Econometrics Forecasting Associates in Philadelphia. Mr. Preiss' work at Wharton with Klein included extensive model development. His background in econometrics, model building, and data research/management are particularly relevant to the sophisticated analysis techniques that Mr. Preiss provides for his clients. This unique set of technical skills and practical business experience is what sets Preiss&Associates apart from other compliance consulting firms.



Richard Saillard

Compliance Specialist

Large Bank Supervision

Office of the Comptroller of the Currency

Richard Saillard has been with the OCC for 31 years and has served in a variety of capacities. For the last 20 years, Mr. Saillard has been a Compliance Specialist in the OCC's Large Bank Program. He serves as the OCC's Compliance Liaison at JPMorgan Chase. Prior to his current assignment, he served as Compliance Liaison at U.S. Bank, Firststar, Bank One, the First National Bank of Chicago, and Citibank. Mr. Saillard also has a background in examining banks for safety and soundness. He was commissioned as a National Bank Examiner in 1982 and was the Field Manager of the OCC's Rockford, Illinois office for five years.

Mark Schultz

Senior Director

Fair Lending

Capital One

Mark Schultz joined Capital One in 2004 and is the Senior Director responsible for Fair Lending. In this capacity, he oversees fair lending compliance for all U.S.-based lending businesses, including the Fair Lending consultation and approval of all credit models, credit policies, and fair lending analysis of all areas for the company that use judgmental decision-making processes. Mr. Schultz previously worked at the Federal Reserve Board in Washington, D.C. for 15 years. Five of these years were spent in the compliance examination area and the other 10 were in various staff and management positions within the Information Technology division, working on Home Mortgage Disclosure Act, Community Reinvestment Act, and examination data. While in the compliance examination area, he was the lead examiner for developing and managing fair lending analytical techniques.

Mr. Schultz received a B.S. in finance from the University of Maryland and an M.B.A. in financial risk management from Virginia Tech. He holds a Certified Regulatory Compliance Manager certification and represents Capital One on the Consumer Bankers Association Fair Lending committee.

Jesse Stiller

Special Adviser

Executive Communications

Office of the Comptroller of the Currency

Jesse Stiller is Special Adviser for Executive Communications at the OCC. In connection with the OCC's upcoming 150th anniversary in 2013, Mr. Stiller is now preparing the first comprehensive history of the OCC in 50 years. He has a long list of books and articles to his credit, as well as a Ph.D. in history from the City University of New York, where he was a student of Arthur Schlesinger Jr.

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Mattie E. Trice

National Bank Examiner

Large Bank Supervision

Office of the Comptroller of the Currency

Mattie E. Trice is a National Bank Examiner with the OCC assigned to Large Bank Supervision. The Large Bank Supervision Division is responsible for examinations and supervisory activities in the largest national banks. Ms. Trice is based in Charlotte, North Carolina, and is responsible for the compliance supervision of Wachovia, the fourth-largest banking company in the United States, based upon assets.

Ms. Trice joined the OCC in 1976 as a Field Examiner in Nashville, Tennessee. She served as a Field Examiner in Memphis, Tennessee, and Atlanta, Georgia, and she worked in the Southeastern District Office (Examination Support) for several years. She has examined community banks, midsize banks, and large banks for general safety and soundness as well as for compliance.

Ms. Trice transferred to the Multinational Banking Division/Large Bank Supervision Division in 1994. In Charlotte, she has also had responsibility for a portfolio of midsize and credit card banks. Currently, her compliance supervision responsibilities include the oversight of measures to promote consumer protection, Bank Secrecy Act compliance, and anti-money laundering prevention/detection.

Ms. Trice graduated from Tennessee Technological University, Cookeville, Tennessee, in 1979.

Daphne Whistler

Compliance Lead Expert

Midsize Bank Supervision

Office of the Comptroller of the Currency

Daphne Whistler is a Compliance Lead Expert for Midsize Bank Supervision at the OCC. Ms. Whistler provides advice and support to midsize bank supervision management and examiners on complex and emerging issues in compliance risk and monitors the areas of highest risk within the midsize bank portfolio. Ms. Whistler is a commissioned National Bank Examiner and has led and participated in a variety of compliance examinations of community, midsize and large banks. Prior to joining the OCC in 1999, she served over 16 years in the banking industry, including as Director of Compliance and Community Reinvestment of a midsize bank holding company.

Ms. Whistler holds a B.S. in accounting, an M.B.A., and the industry certifications of Certified Regulatory Compliance Manager and Certified Bank Auditor.



Harvey Wright

National Bank Examiner

Large Bank Supervision

Office of the Comptroller of the Currency

Harvey Wright is a National Bank Examiner with the OCC. Mr. Wright is assigned to the OCC's Large Bank Supervision Division. That division is responsible for the supervision of the nation's largest national banks.

Mr. Wright has been with the OCC for 18 years, starting in the Atlanta Field Office as a safety and soundness examiner supervising community banks. Commissioned in 1997, Mr. Wright transferred to the Los Angeles Field Office where he supervised a portfolio of more complex community banks and federal branches of foreign banks. In 1999, he became a compliance specialist where he examined credit card, midsize, and large banks headquartered on the West Coast, including Alaska. He has participated in Shared National Credit reviews and served as an evaluator for the OCC's Uniform Commission Examination. Between August 2003 and March 2007, Mr. Wright served as the OCC's resident compliance examiner for Countrywide Bank, N.A. He also served as the compliance lead examiner for Zions Bank and its national affiliates from July 2005 to October 2006. In April 2007, he joined the OCC's core supervisory team in Charlotte, North Carolina, that is responsible for Wachovia Bank, the nation's fourth-largest banking company.

Mr. Wright graduated from the University of South Carolina in Columbia, South Carolina, in 1989 with a degree in economics.